



SEALED

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DISTRICT OF NEVADA	
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 6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,

) **SEALED**
) CRIMINAL INDICTMENT
) 2:13-cr- 368

11 Plaintiff,

)
 12 vs.
 WILLIAM C. THOMPSON,
 13 Defendant.

) **VIOLATIONS:**
) Sexual Exploitation of a Child
) 18 U.S.C. § 2251(a);
) Advertising Child Pornography
) 18 U.S.C. § 2251(d)
) Transportation of Child Pornography
) 18 U.S.C. § 2252A(a)(1)
) Distribution of Child Pornography
) 18 U.S.C. § 2252A(a)(3)

14
 15 THE GRAND JURY CHARGES THAT:

16
 17 **COUNT ONE**

Sexual Exploitation of a Child

18 1. From on or about January 2012 to on or about November 20, 2012, in the State

19 and Federal District of Nevada, and elsewhere,

20 WILLIAM C. THOMPSON,

21 defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in
 22 sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which
 23 visual depiction was produced using materials that had been mailed, shipped, and transported in

1 interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a)
2 and 2251(e).

COUNT TWO

2. From an unknown date to on or about November 24, 2012, in the State and Federal District of Nevada,

WILLIAM C. THOMPSON,

the defendant herein, did knowingly make and publish, and cause to be made and published, a notice and advertisement offering to exchange, display, distribute and reproduce any visual depiction, where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, and such notice and advertisement was transported using any means and facility of interstate commerce, and was transported in interstate commerce by any means including by computer, in violation of Title 18, United States Code, Section 2251(d)(1)(A).

COUNT THREE

3. From an unknown date to on or about November 20, 2012, in the State and Federal District of Nevada,

WILLIAM C. THOMPSON,

19 the defendant herein, did knowingly reproduce any child pornography, as defined in Title 18,
20 United States Code, Section 2256(8), using any means and facility of interstate and foreign
21 commerce; and in and affecting interstate and foreign commerce by any means, including by
22 computer, in violation of Title 18, United States Code, Section 2252A(a)(3)(A) and (B).

23 | //

24 | //

FORFEITURE ALLEGATION ONE
Sexual Exploitation of a Child

1. The allegations contained in Count One of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1).

2. Upon conviction of the felony offense charged in Count One of this Criminal Indictment,

WILLIAM C. THOMPSON,

defendant herein, shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251(a):

1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This computer contained a Seagate 1 TB SATA hard drive. Model No. ST1000DM003. Serial No. S1D0MRJQ.
2. Hitachi 2TB external hard drive. Model No. HT0LDNB20001BBB. Serial No. F31G2NXD.
3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No. WCAV5M930266.
4. San Disk Card Reader.
5. San Disk 16GB Compact Flash Card.
6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.
7. 2 micro video cassettes.
8. Proof of residence documents.

- 1 9. Compaq Presario laptop computer. Model No. CQ57. Serial No.
2 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive.
3 Model No. ST9320325AS. Serial No. 6VDFR10V.
- 4 10. Canon Mark II digital camera. Serial No. 4252102526.
- 5 11. Emachines desktop computer. Model No. EL1850. Serial No.
6 PTNBK02012040038589600. This computer contained a 500GB SATA
7 hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.
- 8 12. Gateway desktop computer. Model No. DX4860-UB33P. Serial No.
9 PTGCPP200420400EF66300. This computer contained a Western Digital
10 1TB SATA hard drive. Model No. WD10EARX. Serial No.
11 WMC0T0032462.
- 12 13. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
13 MXX71406PP. This computer contained a Samsung 160GB SATA hard
14 drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.
- 15 14. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
16 No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.
- 17 15. 100 CD's and DVD's.
- 18 16. 13 CD's and DVD's.
- 19 17. Hitachi DVD Cam. Serial No. 50320241.
- 20 18. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
21 device has no internal memory, but has media card and a 3.5 inch floppy
22 diskette. The media card has 128MB of memory.
- 23 19. Kodak digital camera. Model No. Easyshare Z710. Serial No.
24 KCXGG64336528.
- 25 20. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

26 All pursuant to Title 18, United States Code, Sections 2251, 2251(a), and 2253(a)(1).

27 **FORFEITURE ALLEGATION TWO**
28 **Sexual Exploitation of a Child**

29 1. The allegations contained in Count One of this Criminal Indictment are hereby
30 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
31 Title 18, United States Code, Section 2253(a)(3).

2. Upon conviction of the felony offense charged in Count One of this Criminal Indictment,

WILLIAM C. THOMPSON,

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of Title 18, United States Code, Section 2251(a) or any property traceable to such property:

1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This computer contained a Seagate 1 TB SATA hard drive. Model No. ST1000DM003. Serial No. S1D0MRJQ.
2. Hitachi 2TB external hard drive. Model No. HT0LDNB20001BBB. Serial No. F31G2NXD.
3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No. WCAV5M930266.
4. San Disk Card Reader.
5. San Disk 16GB Compact Flash Card.
6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.
7. 2 micro video cassettes.
8. Compaq Presario laptop computer. Model No. CQ57. Serial No. 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive. Model No. ST9320325AS. Serial No. 6VDFR10V.
9. Canon Mark II digital camera. Serial No. 4252102526.
10. Emachines desktop computer. Model No. EL1850. Serial No. PTNBK02012040038589600. This computer contained a 500GB SATA hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.
11. Gateway desktop computer. Model No. DX4860-UB33P. Serial No. PTGCPP200420400EF66300. This computer contained a Western Digital 1TB SATA hard drive. Model No. WD10EARX. Serial No. WMC0T0032462.

- 1 12. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
2 MXX71406PP. This computer contained a Samsung 160GB SATA hard
3 drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.
- 4 13. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
5 No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.
- 6 14. 100 CD's and DVD's.
- 7 15. 13 CD's and DVD's.
- 8 16. Hitachi DVD Cam. Serial No. 50320241.
- 9 17. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
10 device has no internal memory, but has media card and a 3.5 inch floppy
11 diskette. The media card has 128MB of memory.
- 12 18. Kodak digital camera. Model No. Easyshare Z710. Serial No.
13 KCXGG64336528.
- 14 19. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

12 All pursuant to Title 18, United States Code, Sections 2251(a) and 2253(a)(3).

13 **FORFEITURE ALLEGATION THREE**
14 **Advertising Child Pornography**

15 1. The allegations contained in Count Two of this Criminal Indictment are hereby
16 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
17 Title 18, United States Code, Section 2253(a)(1).

18 2. Upon conviction of the felony offense charged in Count Two of this Criminal
19 Indictment,

20 WILLIAM C. THOMPSON,

21 defendant herein, shall forfeit to the United States of America, any visual depiction described in
22 Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape,

1 or other matter which contains any such visual depiction, which was produced, transported,
2 mailed, shipped, or received in violation of Title 18, United States Code, Section 2251(d)(1)(A):

- 3 1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This
4 computer contained a Seagate 1 TB SATA hard drive. Model No.
5 ST1000DM003. Serial No. S1D0MRJQ.
- 6 2. Hitachi 2TB external hard drive. Model No. HT0LDNB20001BBB. Serial
7 No. F31G2NXD.
- 8 3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No.
9 WCAV5M930266.
- 10 4. San Disk Card Reader.
- 11 5. San Disk 16GB Compact Flash Card.
- 12 6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.
- 13 7. 2 micro video cassettes.
- 14 8. Proof of residence documents.
- 15 9. Compaq Presario laptop computer. Model No. CQ57. Serial No.
16 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive.
17 Model No. ST9320325AS. Serial No. 6VDFR10V.
- 18 10. Canon Mark II digital camera. Serial No. 4252102526.
- 19 11. Emachines desktop computer. Model No. EL1850. Serial No.
20 PTNBK02012040038589600. This computer contained a 500GB SATA
21 hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.
- 22 12. Gateway desktop computer. Model No. DX4860-UB33P. Serial No.
23 PTGCPP200420400EF66300. This computer contained a Western Digital
24 1TB SATA hard drive. Model No. WD10EARX. Serial No.
 WMCO0T0032462.
13. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
14. MXX71406PP. This computer contained a Samsung 160GB SATA hard
15. drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.
16. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
17. No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.
18. 15. 100 CD's and DVD's.

- 1 16. 13 CD's and DVD's.
- 2 17. Hitachi DVD Cam. Serial No. 50320241.
- 3 18. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
4 device has no internal memory, but has media card and a 3.5 inch floppy
5 diskette. The media card has 128MB of memory.
- 6 19. Kodak digital camera. Model No. Easyshare Z710. Serial No.
7 KCXGG64336528.
- 8 20. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

9 All pursuant to Title 18, United States Code, Sections 2251, 2251(d)(1)(A), and
10 2253(a)(1).

11 **FORFEITURE ALLEGATION FOUR**
12 **Advertising Child Pornography**

13 1. The allegations contained in Count Two of this Criminal Indictment are hereby
14 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
15 Title 18, United States Code, Section 2253(a)(3).

16 2. Upon conviction of the felony offense charged in Count Two of this Criminal
17 Indictment,

18 WILLIAM C. THOMPSON,

19 defendant herein, shall forfeit to the United States of America, any property, real or personal,
20 used or intended to be used to commit or to promote the commission of Title 18, United States
21 Code, Section 2251(d)(1)(A) or any property traceable to such property:

- 22 1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This
23 computer contained a Seagate 1 TB SATA hard drive. Model No.
24 ST1000DM003. Serial No. S1D0MRJQ.
- 25 2. Hitachi 2TB external hard drive. Model No. HT0LDNB20001BBB. Serial
26 No. F31G2NXD.

- 1 3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No.
2 WCAV5M930266.
- 3 4. San Disk Card Reader.
- 4 5. San Disk 16GB Compact Flash Card.
- 5 6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.
- 6 7. 2 micro video cassettes.
- 7 8. Compaq Presario laptop computer. Model No. CQ57. Serial No.
8 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive.
9 Model No. ST9320325AS. Serial No. 6VDFR10V.
- 10 9. Canon Mark II digital camera. Serial No. 4252102526.
- 11 10. Emachines desktop computer. Model No. EL1850. Serial No.
12 PTNBK02012040038589600. This computer contained a 500GB SATA
13 hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.
- 14 11. Gateway desktop computer. Model No. DX4860-UB33P. Serial No.
15 PTGCPP200420400EF66300. This computer contained a Western Digital
16 1TB SATA hard drive. Model No. WD10EARX. Serial No.
17 WMC0T0032462.
- 18 12. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
19 MXX71406PP. This computer contained a Samsung 160GB SATA hard
20 drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.
- 21 13. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
22 No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.
- 23 14. 100 CD's and DVD's.
- 24 15. 13 CD's and DVD's.
- 16 16. Hitachi DVD Cam. Serial No. 50320241.
- 17 17. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
18 device has no internal memory, but has media card and a 3.5 inch floppy
19 diskette. The media card has 128MB of memory.
- 20 18. Kodak digital camera. Model No. Easyshare Z710. Serial No.
21 KCXGG64336528.
- 22 19. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

23 All pursuant to Title 18, United States Code, Sections 2251(d)(1)(A) and 2253(a)(3).

FORFEITURE ALLEGATION FIVE
Distribution of Child Pornography

1. The allegations contained in Counts Three and Four of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1).

2. Upon conviction of any felony offenses charged in Counts Three or Four of this
Criminal Indictment,

WILLIAM C. THOMPSON,

defendant herein, shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Section 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252A(a)(3)(A) and (B);

1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This computer contained a Seagate 1 TB SATA hard drive. Model No. ST1000DM003. Serial No. S1D0MRJQ.
2. Hitachi 2TB external hard drive. Model No: HT0LDNB20001BBB. Serial No. F31G2NXD.
3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No. WCAV5M930266.
4. San Disk Card Reader.
5. San Disk 16GB Compact Flash Card.
6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.
7. 2 micro video cassettes.
8. Proof of residence documents.

- 1 9. Compaq Presario laptop computer. Model No. CQ57. Serial No.
2 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive.
3 Model No. ST9320325AS. Serial No. 6VDFR10V.
- 4 10. Canon Mark II digital camera. Serial No. 4252102526.
- 5 11. Emachines desktop computer. Model No. EL1850. Serial No.
6 PTNBK02012040038589600. This computer contained a 500GB SATA
7 hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.
- 8 12. Gateway desktop computer. Model No. DX4860-UB33P. Serial No.
9 PTGCPP200420400EF66300. This computer contained a Western Digital
10 1TB SATA hard drive. Model No. WD10EARX. Serial No.
11 WMC0T0032462.
- 12 13. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
13 MXX71406PP. This computer contained a Samsung 160GB SATA hard
14 drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.
- 15 14. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
16 No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.
- 17 15. 100 CD's and DVD's.
- 18 16. 13 CD's and DVD's.
- 19 17. Hitachi DVD Cam. Serial No. 50320241.
- 20 18. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
21 device has no internal memory, but has media card and a 3.5 inch floppy
22 diskette. The media card has 128MB of memory.
- 23 19. Kodak digital camera. Model No. Easyshare Z710. Serial No.
24 KCXGG64336528.
- 25 20. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

26 All pursuant to Title 18, United States Code, Sections 2252A, 2252A(a)(3)(A) and (B),
27 and 2253(a)(1).

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2 **FORFEITURE ALLEGATION SIX**
3 **Distribution of Child Pornography**

4
5 1. The allegations contained in Counts Three and Four of this Criminal Indictment are
6 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
7 pursuant to Title 18, United States Code, Section 2253(a)(3).

8 2. Upon conviction of any felony offenses charged in Counts Three or Four of this
9 Criminal Indictment,

10 WILLIAM C. THOMPSON,

11 defendant herein, shall forfeit to the United States of America, any property, real or personal,
12 used or intended to be used to commit or to promote the commission of Title 18, United States
13 Code, Section 2252A(a)(3)(A) or any property traceable to such property:

14 1. Dell computer tower. Model No. Vostro 400. Serial No. D2CXRF1. This
15 computer contained a Seagate 1 TB SATA hard drive. Model No.
16 ST1000DM003. Serial No. S1D0MRJQ.

17 2. Hitachi 2TB external hard drive. Model No. HT0LDNB20001BBB. Serial
18 No. F31G2NXD.

19 3. Western Digital 1 TB hard drive. Model No. WD10EADS. Serial No.
20 WCAV5M930266.

21 4. San Disk Card Reader.

22 5. San Disk 16GB Compact Flash Card.

23 6. Panasonic Video Camera. Model No. SDR-H85P. Serial No. J01A18002.

24 7. 2 micro video cassettes.

25 8. Compaq Presario laptop computer. Model No. CQ57. Serial No.
26 5CB2174R1P. This laptop contained a Seagate 320GB SATA hard drive.
27 Model No. ST9320325AS. Serial No. 6VDFR10V.

28 9. Canon Mark II digital camera. Serial No. 4252102526.

29 10. Emachines desktop computer. Model No. EL1850. Serial No.

1 PTNBK02012040038589600. This computer contained a 500GB SATA
2 hard drive. Model No. HDS721050CLA362. Serial No. HE1B1MMT.

3 11. Gateway desktop computer. Model No. DX4860-UB33P. Serial No.
4 PTGCPP200420400EF66300. This computer contained a Western Digital
1TB SATA hard drive. Model No. WD10EARX. Serial No.
WMC0T0032462.

5 12. Compaq Presario desktop computer. Model No. SR5034X. Serial No.
6 MXX71406PP. This computer contained a Samsung 160GB SATA hard
drive. Model No. HD160JJ/P. Serial No. S0DFJ1GP107611.

7 13. Apple iPhone 4S. Model No. A1387. Serial No. CBPH20MGDTDW. IMEI
8 No. 99000110136386. Sprint mini SIM card. No. 8901010008831126638F.

9 14. 100 CD's and DVD's.

10 15. 13 CD's and DVD's.

11 16. Hitachi DVD Cam. Serial No. 50320241.

12 17. Sony Digital Camera. Model No. MVC-FD100. Serial No. 500023. This
device has no internal memory, but has media card and a 3.5 inch floppy
diskette. The media card has 128MB of memory.

13 18. Kodak digital camera. Model No. Easyshare Z710. Serial No.
14 KCXGG64336528.

15 19. Kodak digital camera. Model No. Z981. Serial No. KVYMN02061276.

16 All pursuant to Title 18, United States Code, Sections 2252A(a)(3)(A) and 2253(a)(3).

17 DATED: this 25th day of Sept., 2013

18 A TRUE BILL:

19 /S/

20 FOREPERSON OF THE GRAND JURY

21 DANIEL G. BOGDEN
United States Attorney

22 
23 ROGER YANG
24 Assistant United States Attorney